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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

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U.S. BANKRUPTCY COURT  
NORTHERN DIST OF MISS

**IN RE:**

**FF ACQUISITION CORP. D/B/A FLEXIBLE-FLYER  
Debtor**

**CHAPTER 11  
CASE NO. 05-16187**

**MOTION FOR EXTENSION OF TIME TO FILE  
SCHEDULES, STATEMENTS, AND RELATED DOCUMENTS**

COMES NOW FF Acquisition Corp. d/ba Flexible-Flyer (the "Debtor") and files this, its Motion for Extension of Time to File Schedules, Statements, and Related Documents, and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1. On September 9, 2005, the Debtor filed its Voluntary Petition for reorganization with this Court under Chapter 11 of the Bankruptcy Code. The Debtor is required to file its Schedules and Statement of Financial Affairs and other lists and related documents on or before October 3, 2005. The Debtor and its counsel have diligently attempted to gather the information necessary to complete these documents and file them in a timely manner; however, because of the extent of the information involved, they have not yet been able to do so.

2. The Debtor, therefore, seeks additional time to file its Schedules and Statement of Financial Affairs in order to properly present their position in this case.

3. The granting of this additional time will not significantly delay the progress of this matter, and the documents will be filed before the Meeting of Creditors pursuant to 11 U.S.C. Section 341(a) in this case, so as to allow the creditors to examine and review the documents prior to said Meeting.

4. As outlined in the Affidavit of Craig M. Geno, one of the counsel for the Debtor,

which is attached hereto as Exhibit "A", this extension of time is not sought for the purpose of delaying this case before this Court, and the granting of this Motion will not prejudice any creditor or grant any unfair advantage to the Debtor.

5. The Debtor requests that this Court grant it until and including October 17, 2005, to file its Schedules and Statement of Financial Affairs and related documents.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court grant it an extension, up to and including October 17, 2005, to file the Schedules and Statement of Financial Affairs and related documents they are required to file in this Chapter 11 case. The Debtor prays for other such general and specific relief as this Court may deem just.

THIS, the 22<sup>nd</sup> day of September, 2005.

Respectfully submitted,

FF ACQUISITION CORP.  
D/B/A FLEXIBLE-FLYER

By Its Attorneys,  
HARRIS & GENO, PLLC

By:  \_\_\_\_\_

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jeffrey K. Tyree; MSB No. 9049  
Melanie T. Vardaman; MSB No. 100392  
Harris & Geno, PLLC  
587 Highland Colony Parkway (39157)  
P. O. Box 3380  
Ridgeland, MS 39158-3380  
601-427-0048 - Telephone  
601-427-0050 - Facsimile

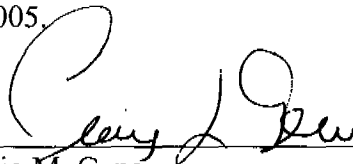
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.  
Office of the United States Trustee  
Suite 706, A. H. McCoy Federal Building  
100 West Capitol Street  
Jackson, MS 39269

THIS, the 22<sup>nd</sup> day of September, 2005.

  
\_\_\_\_\_  
Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**

**FF ACQUISITION CORP. D/B/A FLEXIBLE-FLYER  
Debtor**

**CHAPTER 11  
CASE NO. 05-16187**

**EXHIBIT “A”**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**

**FF ACQUISITION CORP. D/B/A FLEXIBLE-FLYER  
Debtor**

**CHAPTER 11  
CASE NO. 05-16187**

**AFFIDAVIT**

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno ("Affiant") of Harris & Geno, PLLC, Post Office Box 3380, Ridgeland, MS 39158-3380, counsel for the Debtor, who after having been duly sworn, states on oath that this Affidavit is submitted in support of the Debtor's Motion for Extension of Time to File Schedules, Statements, and Related Documents (the "Motion"), that the extension requested in the Motion is not sought for the purpose of delaying this case before this Court, and the granting of the Motion will not prejudice any creditor or grant any unfair advantage to the Debtor. Affiant hereby makes request for the extension of time requested in the Motion.

  
\_\_\_\_\_  
Craig M. Geno

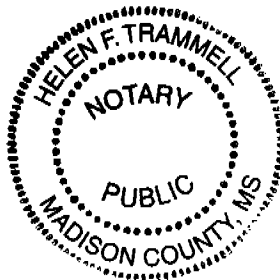
STATE OF MISSISSIPPI  
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 21<sup>st</sup> day of September, 2005.

  
\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES

5-30-07



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:**

**FF ACQUISITION CORP. D/B/A FLEXIBLE-FLYER  
Debtor**

**CHAPTER 11  
CASE NO. 05-16187**

**ORDER**

THIS CAUSE having come on to be heard on the Motion for Extension of Time to File Statement of Financial Affairs and Schedules (the "Motion") filed herein by FF Acquisition Corp. d/b/a Flexible-flyer (the "Debtor"), and the Court having heard and considered the Motion, and being otherwise fully advised in the matter, is of the opinion that the Motion is well-taken and should be sustained. It is accordingly,

ORDERED, that the Statement of Financial Affairs and Schedules which are required to be filed within this Chapter 11 case shall be filed on or before October 17, 2005.

ORDERED, this the \_\_\_\_\_ day of September, 2005.

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DAVID W. HOUSTON, III  
UNITED STATES BANKRUPTCY JUDGE

PRESENTED BY:

Craig M. Geno; MSB No. 4793  
Jeffrey K. Tyree; MSB No. 9049  
Melanie T. Vardaman; MSB No. 100392  
Harris & Geno, PLLC  
587 Highland Colony Parkway (39157)  
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